

# **Action Taken Report**

## **In the matter before the Hon'ble NGT Order O.A No. 438 of 2021 i.e. Parvavaran Mitra V/s State of Gujarat.**

### **1) Major points in complaint:**

Huge Pollution caused by disposing plastic waste in illegal manner by SML Films Industries Limited, Plot No. A-17/1, A-10/2, A-16/2, Sector –A, Icchapor-Bhatpor, GIDC Estate, Surat, Gujarat and burning of plastic waste by the industry emits foul gases which is dangerous to the health of the residents of the surrounding areas, started new construction on mass scale and has removed soil and trees from the site without requisite statutory permission and has also unauthorizely constructed a 10 lakhs liter Glycol tank.

### **2) Direction:**

As per order dated: 27.01.2022 “to ascertain the factual position in the matter through a joint Committee of the Central Pollution Control Board (CPCB), the Gujarat State Pollution Control Board (GSPCB), Gujarat Industrial Development Corporation (GIDC), SEIAA and the District Magistrate-Surat look into the grievance of the applicant. Furnish a factual and action taken report”.

As per order dated: 09.05.2022 “Coal was being used as a fuel, nothing is mentioned about generation and disposal of fly ash. Further, requisite EC has not been obtained. Since operations of the unit in question are in violation of requirement of EC, the State PCB has to take further action against such illegal operations, following due process of law. A further action taken report may be filed within two months.”

### **3) Latest status of the Industries:**

- Unit is engaged in the manufacturing BOPET film/Polyester film – 8700 MT/Month, Metalized (BOPET) Polyester film – 2000 MT/Month, CCA valid up to 07-11-2022.
- CTE amendment was granted by GPCB on 27.11.2021 for BOPET Line- 4, 5 & 6, Metallic Film, BOPP Line-1 (New product) and addition of new Plots A-11/2 and A-17/2 and the construction work of BOPET line 4,5& 6 along with other machineries storage, TFH, etc. was going on according to CTE amendment granted for following products:
  1. Bi-axially oriented polyester film (BOPET Film/Polyester Film) – 16,700 MT/Month.
  2. Metallized Polyester Film – 3000 MT/Month.
  3. BOPP Film – 4500 MT/Month.
  4. Metallized (BOPET) Poly Propylene Film – 500 MT/Month.
- The four category of products mentioned above for which CTE was granted by GPCB on 27.11.2021 does not attract EC. Besides these products, the unit has proposed for production of Polyester chips which attracts the provision of EIA Notification 2006. EC has been approved by SEIAA Gujarat for the same vide letter No. SEIAA/GUJ/EC/5(d)/578/2022, dated 28-02-2022.

**Salient features is as follows:**

A propose directions of the Hon'ble NGT, Joint Committee has visited the site on 25/02/2022. The committee comprises of following officers;

- 1) Shri Aayush Oak, IAS, (Collector & District Magistrate, Surat).
- 2) Shri N. Semwal (Scientist C, CPCB, Baroda).
- 3) Dr. J. D. Oza (Regional officer, Surat).
- 4) Mehul Patel (DEE, SEIAA).
- 5) Parimal Patel (Dy. Engineer, GIDC, Surat).

- Joint committee also observed during the site visit that the construction and commissioning of plant machinery is in line 4, 5 & 6 and limited to non – EC attracted products for which necessary permissions have been obtained by the unit from the GPCB.
- As per GIDC, Surat letter no. GIDC/EE/SURST/1435, dated 5-3-2022 there was no plants/trees in the plots allotted to M/s. SML Films Ltd., from time to time.
- It is informed by the GPCB and GIDC that they have not received any such complaint regarding burning of plastic waste in open or foul smell originating from the unit in the past.
- Generated cutting plastic films waste is recycling back in to processes.
- Generated waste lumps and Side Cutting OR Trim material and metalized BOPET films which sold out to those units are not registered under plastic waste rules-2016.
- Regional office, GPCB, Surat has issued SCN to unit dated 26-04-2022 for non-compliance of Plastic waste rules.
- The EIA report submitted by the unit for the proposed expansion of polyester chips manufacturing show the layout of existing, under commissioning and proposed different units of the plant. The EIA report addressed the fire safety details of the plant and the two tanks of 1000 KL capacity each are shown in the layout as water storage tanks which were observed by the joint committee during visit in red color and unit has informed that this tanks are meant for water storage for fire extinguisher.
- In the past GPCB and Regional Office carried out inspection on 24.03.2021 and subsequently, Closure Directions under Section 5 of the Environment (Protection) Act-1986 was issued to the unit by GPCB on 23.04.2021.
- Further, the unit was inspected by GPCB on 25.05.2021 and basis of observation Revocation of closure order was issued on 25/06/2021.
- Regional officer, Surat has filed legal case to chief judicial magistrate court, Surat (Case No. 73498) and same is disposed on 11/12/2021.
- The unit was inspected by Regional Office Bhopal of MoEF&CC on 26.06.2021 with reference to a letter dated 12.04.2021 from MoEF&CC New Delhi. The major outcomes of the report are as follows:
  - *It is seen that front open land is proposed for CP plant of plot on.A-17/2. In the same plot no. A-17/2 the construction work is in progress for line 4 & 5 (BOPP line) and associated utilities are in progress. PP submitted that this activity not attracted by EC products and they have CTE and amendment for the above activity. However, the construction in the same plot claims to be for only this activity. PP categorically*

*stated they have obtained TOR and for the EC attracted products but not started any construction.*

- *Site inspection of Plot No. A-17/1, A-17/2, A-10/2, A-16/2 & A-11/2 was carried out and it was observed that construction work on line no. 4 & 5 is under progress as per CTE (amended) and the portion in question A-17/2 having proposed CP plant is not yet constructed and the plot was vacant at the time of visit. The two big tanks having 1000 Kl capacity have been erected and said to be used for water storage for fire extinguisher. These tanks are coloured by red fire extinguisher colour. The Project Proponent was directed to follow the condition of ToR and submit the project as per direction of SEIAA Gujarat.*
- Unit is again visited by officials of the GPCB on 18-05-2022 and shows “tanks are observed empty, commissioning of plant machinery is going on and no any connections with this tank are observed”.
- Installed coal based Thermic fluid heater (capacity 6000 U) were found operational.
- Installed Air pollution control measures (APCM) ESP followed by wet scrubber is also found in operation.
- As per Inspection Report dated 18-05-2022, “fly ash stock @ 1.5 MT is observed in storage area. Fly ash generation and disposal details show that. Total 234.08 MT fly ash generations from June-2021 to May 2022 and 232.45 MT of fly ash supply to M/S Madhav Bricks, Near Khodiyar Mataji Mandir, Hazira Road, Variyav, Surat for bricks manufacturing.
- Unit is maintaining Zero Liquid Discharge (ZLD) condition as prescribes in CC&A byrecycling back.

Encl:- 1) Copy E C approved by SEIAA Gujarat (**Annexure-A**).  
2) Copy of Closure Directions under Section 5 of the EPACT (**Annexure-B**).  
3) Copy of Revocation of closure order (**Annexure-C**).  
4) Copy of SCN issued 26-04-2022 (**Annexure-D**).  
5). Report dated 18-5-2022 (**Annexure-E**).

S. J. PANDIT, IFS (Retd.)  
MEMBER SECRETARY  
SEIAA (GUJARAT)



Annexure-A  
STATE LEVEL ENVIRONMENT  
IMPACT ASSESSMENT  
AUTHORITY  
GUJARAT

Government of Gujarat

No. SEIAA/GUJ/EC/5(d)/ 578 /2022

Date: 29 FEB 2022

By R P A D  
Time Limit

Sub: Environment Clearance to M/s. SML Films Limited for setting up expansion in manufacturing plant of 'Manmade Fabric' at Plot No: A-17/1, A-17/2, A-10/2, A-16/2 & A-11/2, Sector - A, Ichhapore - Bhatpore GIDC Estate, Vill: Bhatpore, Tal: Choryasi, Dist: Surat - 394 510. State: Gujarat. In Category 5(d) of Schedule annexed with EIA Notification dated 14/09/2006.

Ref: Your Proposal No. SIA/GJ/IND2/61340/2020.

Dear Sir,

This has reference to your application along with EIA report dated 29/04/2021 submitted to SEIAA, seeking Environmental Clearance under Environment Impact Assessment Notification, 2006.

The proposal is for Environmental Clearance to M/s. SML Films Limited for setting up expansion in manufacturing plant of 'Manmade Fabric' at Plot No: A-17/1, A-17/2, A-10/2, A-16/2 & A-11/2, Sector - A, Ichhapore - Bhatpore GIDC Estate, Vill: Bhatpore, Tal: Choryasi, Dist: Surat - 394 510. State: Gujarat. It is an existing unit for manufacturing following products, which falls in the category - 5(d) of the schedule of the EIA Notification-2006.

Sr. No.	Name Of Product	Quantity (MT/Month)			End Use
		Existing	Proposed	Total after Expansion	
1.	Bi Axial Oriented polyester Film (BOPET)	8700	8000	16700	Packing Material & Making of Jari Products or textile product
2.	Bi-Axially Oriented Poly Propylene Film (BOPP)		4500	4500	
3.	Metalized BOPET	2000	1000	3000	
4.	Metalized BOPP	-	500	500	
5.	Polyester chips		12000	12000	Making of polyester film or yarn

The project activity is covered in 5(d) and is of 'B' Category. Since, the proposed project is located in notified industrial area, public consultation is not required as per paragraph 7(i) (III) (i) (b) of the Environment Impact Assessment Notification-2006.

The SEAC, Gujarat vide their letter dated 17/01/2022 had recommended to the SEIAA, Gujarat, to grant the Environment Clearance for the above-mentioned project based on its meeting held on 29/11/2021. The proposal was considered by SEIAA, Gujarat in its meeting held on 29/01/2022 & 28/02/2022 at Gandhinagar. After careful consideration, the SEIAA hereby accords Environmental Clearance to above project under the provisions of EIA Notification dated 14th September, 2006 subject to the compliance of the following conditions.

**A. CONDITIONS:**

**A.1 SPECIFIC CONDITION:**

1. This Environment Clearance is accorded subject to the direction as may be given by Hon'ble NGT in the O.A. No. 438/2021.
2. Unit shall install CEMS [Continuous Emission Monitoring System] in line to CPCB directions to all SPCB vide letter no. B-29016/04/06PCI-1/5401 dated 05/02/2014 for effluent discharge and air emission as per pollutants discharge/emission from respective project and an arrangement shall also be done for reflecting the online monitoring results on the company's server, which can be assessable by the GPCB/CPCB on real time basis. [For Small/Large/Medium (Red Category) & Whichever (Air emission & Effluent discharge) is applicable].
3. Leak Detection and Repair (LDAR) program shall be prepared and implemented as per the CPCB guidelines. LDAR logbooks shall be maintained.
4. The National Ambient Air Quality Emission Standards issued by the Ministry vide G. S. R. No. 826 (E) dated 16th November, 2009 shall be complied with.
5. National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G. S. R. 608 (E)

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dated 21/07/2010 and amended from time to time shall be followed.

6. Unit shall have to adhere to the prevailing area specific policies of GPCB with respect to the discharge of pollutants, and shall carry out the project development in accordance & consistence with the same.
7. All measures shall be taken to avoid soil and ground water contamination within premises.
8. Unit shall comply CPCB guidelines for Odour Control and its mitigation measures.
9. **Safety & Health:**
  - a. PP shall obtain PESO permission for the storage and handling of hazardous chemicals.
  - b. PP shall provide Occupational Health Centre (OHC) as per the provisions under the Gujarat Factories Rule 68-U.
  - c. PP shall obtain fire safety certificate / Fire No-Objection certificate (NOC) from the concern authority as per the prevailing Rules / Gujarat Fire Prevention and Life Safety Measures Act, 2016.
  - d. Unit shall adopt functional operations/process automation system including emergency response to eliminate risk associated with the hazardous processes.
  - e. PP shall carry out mock drill within the premises as per the prevailing guidelines of safety and display proper evacuation plan in the manufacturing area in case of any emergency or accident.
  - f. PP shall install adequate fire hydrant system with foam trolley attachment within premises and separate storage of water for the same shall be ensured by PP.
  - g. PP shall take all the necessary steps for control of storage hazards within premises, ensuring incompatibility of storage raw material and ensure the storage keeping safe distance as per the prevailing guidelines of the concerned authority.
  - h. PP shall take all the necessary steps for human safety within premises to ensure that no any harm is caused to any worker/employee or labour within premises.
  - i. Flame proof electrical fittings shall be provided in the plant premises, wherever applicable.
  - j. Unit shall never store drum/barrels/carboys of incompatible material/chemical together.
  - k. Unit shall provide effective fire hydrants, water monitors & foam application system at solvent storage area and unit shall provide adequate safety system such as water sprinklers, water curtains, foam pouring system etc. to restrict cascade fire emergency in solvent storage area.
  - l. Unit shall provide effective Isolation for Process area and storage of hazardous chemicals.

**A. 2 WATER:**

10. Total water requirement for the project shall not exceed 767 KLD. Unit shall recycle 264 KLD treated water, RO Permeate, and MEE condensate water in industrial purpose. Hence, fresh water requirement shall not exceed 503 KLD and it shall be met through GIDC supply only. Prior permission from concerned authority shall be obtained for withdrawal of water.
11. The industrial effluent generation from the project shall not exceed 255.50 KLD after expansion.
12. Management of industrial waste water shall be as under:
  - > Industrial effluent from process shall be treated in ETP consist of primary and secondary ETP units and then treated effluent shall be reused into industrial purpose.
  - > Industrial effluent from washing, Cooling Tower and scrubber shall be treated in ETP consist of primary and tertiary unit and then treated effluent shall be send to RO. RO permeate shall be reused for industrial purpose within premises and RO reject shall be evaporated into MEE.
  - > Unit shall feed wastewater to in-house MEE only after ensuring content of effluent for COD/VOC so as not to get air borne during evaporation in order to achieve no adverse impacts on Environment and Human Health.
13. Complete Zero Liquid Discharge [ZLD] status shall be maintained all the time and there shall be no drainage connection from the premises.
14. Domestic wastewater generation shall not exceed 29 KL/Day for proposed project and it shall be treated in STP. It shall not be disposed off through soak pit/ septic tank. Unit shall provide buffer water storage tank of adequate capacity for storage of treated waste water during rainy days.
15. The unit shall provide metering facility at the inlet and outlet of ETP and maintain records for the same.
16. Proper logbooks of ETP; reuse/ recycle of treated/ untreated effluent; chemical consumption in effluent treatment; quantity & quality of treated effluent; power consumption etc. shall be maintained and shall be furnished to the GPCB from time to time.

**A.3AIR:**

17. Unit shall not exceed fuel consumption for Thermic Fluid Heaters as mentioned below.

Stack Attached To			Fuel Consumption			Stack Height	Details of APCM			Final Concentration
Existing	Proposed	After Expansion	Existing	Proposed	After Expansion		Existing	Proposed	After Expansion	
Thermic Fluid Heater - 1	---	Thermic Fluid Heater - 1 (capacit	L.D.O. - 3.4 KL/day or Natural	---	L.D.O. - 3.4 KL/day or Natural	Common Stack No.1 40	As per Adequate Stack	---	As per Adequate Stack Height	SPM SO <sub>2</sub> Nox

(capacity 2500 U) (Stand by)	y 2500 U) (Stand by)	Gas - 12000 SCM/day	Gas - 12000 SCM/day	Mts	Height			
Thermic Fluid Heater - 2 (capacity 2500 U) (Stand by)	Thermic Fluid Heater - 2 (capacity 2500 U) (Stand by)	L.D.O - 3.4 KL/day or Natural Gas - 12000 SCM/day	L.D.O - 3.4 KL/day or Natural Gas - 12000 SCM/day		As per Adequate Stack Height	---	As per Adequate Stack Height	SPM SO <sub>2</sub> Nox
Thermic Fluid Heater - 3 (capacity 2500 U) (Stand by)	Thermic Fluid Heater - 3 (capacity 2500 U) (Stand by)	L.D.O - 3.4 KL/day or Natural Gas - 12000 SCM/day	L.D.O - 3.4 KL/day or Natural Gas - 12000 SCM/day	Common Stack No.2 40 Mts	As per Adequate Stack Height	---	As per Adequate Stack Height	SPM SO <sub>2</sub> Nox
Thermic Fluid Heater - 4 (capacity 2500 U) (Stand-by)	Thermic Fluid Heater - 4 (capacity 2500 U) (Stand-by)	L.D.O - 3.4 KL/day or Natural Gas - 12000 SCM/day	L.D.O - 3.4 KL/day or Natural Gas - 12000 SCM/day	Common Stack No.2 40 Mts	As per Adequate Stack Height	---	As per Adequate Stack Height	SPM SO <sub>2</sub> Nox
Thermic Fluid Heater - 5 (capacity 6000 U)	Thermic Fluid Heater - 5 (capacity 6000 U)	Imported Coal - 40 MT/Day	Imported Coal - 40 MT/Day	Stack No.3 40 Mts	MDC, water Scrubber & ESP	---	MDC, water Scrubber & ESP	SPM SO <sub>2</sub> Nox
Thermic Fluid Heater - 6 (capacity 8000 U)	Thermic Fluid Heater - 6 (capacity 8000 U)	Imported Coal - 45 MT/Day	Imported Coal - 45 MT/Day		MDC, water Scrubber & ESP	---	MDC, water Scrubber & ESP	SPM SO <sub>2</sub> Nox
Thermic Fluid Heater - 7 (capacity 8000 U)	Thermic Fluid Heater - 7 (capacity 8000 U)	Imported Coal - 45 MT/Day	Imported Coal - 45 MT/Day	Common Stack No.4 40 Mts	MDC, water Scrubber & ESP	---	MDC, water Scrubber & ESP	SPM SO <sub>2</sub> Nox
Thermic Fluid Heater - 8 (capacity 8000 U)	Thermic Fluid Heater - 8 (capacity 8000 U)	Imported Coal - 45 MT/Day	Imported Coal - 45 MT/Day		MDC, water Scrubber & ESP	---	MDC, water Scrubber & ESP	SPM SO <sub>2</sub> Nox

18. Unit shall provide adequate APCM with flue gas generation sources to achieve the norms prescribed by GPCB.

19. PP shall use approved fuels only as fuel in Thermic Fluid Heaters.

20. There will be no process gas emission from manufacturing process and ancillary operations.
21. The fugitive emission in the work zone environment shall be monitored. The emission shall conform to the standards prescribed by the concerned authorities from time to time (e.g. Directors of Industrial Safety & Health). Following indicative guidelines shall also be followed to reduce the fugitive emission.
- Internal roads shall be either concreted or asphalted or paved properly to reduce the fugitive emission during vehicular movement.
  - Air borne dust shall be controlled with water sprinklers at suitable locations in the plant.
  - A green belt shall be developed all around the plant boundary and also along the roads to mitigate fugitive & transport dust emission.
22. Regular monitoring of Volatile Organic Compounds (VOCs) shall be carried out in the work zone area and ambient air.
23. For control of fugitive emission, VOCs, following steps shall be followed :
- ✓ Closed handling and charging system shall be provided for chemicals.
  - ✓ Reflux condenser shall be provided over Reactors / Vessels.
  - ✓ Pumps shall be provided with mechanical seals to prevent leakages.
  - ✓ Air borne dust at all transfers operations/ points shall be controlled either by spraying water or providing enclosures.
24. Solvent management shall be carried out as follows:
- ✓ Measures shall be taken to reduce the process vapors emissions as far as possible. Use of toxic solvents shall be minimum. All venting equipment shall have vapour recovery system
  - ✓ Reactor shall be connected to adequate chilling system to condensate solvent vapors and reduce solvent losses.
  - ✓ Reactor and solvent handling pump shall have mechanical seals to prevent leakages
  - ✓ The condensers shall be provided with sufficient HTA and residence time so as to achieve maximum solvent recovery.
  - ✓ Solvents shall be stored in a separate space specified with all safety measures.
  - ✓ Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done.
  - ✓ Solvent storage and handling area shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.
25. Regular monitoring of ground level concentration of PM10, PM2.5, SO2, NOx, and VOCs shall be carried out in the impact zone and its records shall be maintained. Ambient air quality levels shall not exceed the standards stipulated by the GPCB. If at any stage these levels are found to exceed the prescribed limits, necessary additional control measures shall be taken immediately. The location of the stations and frequency of monitoring shall be decided in consultation with the GPCB.

**A.4 SOLID / HAZARDOUS WASTE:**

26. All the hazardous/ solid waste management shall be taken care as mentioned below.

Sr. No.	Waste	Source	Schedule-I	Quantity			Facility
				Existing	Proposed	Total After Expansion	
1	Used Oil	Thermo pack	Sch-I 5.1	1 KL/Year	1 KL/Year	2 KL/Year	Collection, Storage, Transportation, Disposal by selling to Registered Re-refiners, approved by GPCB/CPCB or reused as lubricant for machinery within the factory.
2	ETP Sludge	ETP	Sch-I 35.3	—	365 T/Year	365 T/Year	Collection, Storage, Transportation, Disposal at TSDF site approved by GPCB.
3	Discarded Container/bags & Liners	Raw Material	Sch-I 33.1	3 T/Year	10 T/Year	13 T/Year	Collection, Storage, Transportation, Disposal by selling to Registered facility approved by GPCB.
4	MEE salt	MEE	Sch-I 35.3	—	219 T/Year	219 T/Year	Collection, Storage, Transportation, Disposal at TSDF approved by GPCB.

27. Authorized end-users shall have permissions from the concerned authorities under the Rule 9 of the Hazardous and Other Wastes (Management and Transboundary Movement) Rules 2016.

28. Unit shall explore the possibilities for environment friendly methods like co-processing of hazardous waste for disposal of Incinerable & land fillable wastes before sending to CHWIF & TSDF sites respectively.
29. The project proponent has to obtain membership of TSDF site & CHWIF before obtaining CTO of GPCB.
30. The unit shall submit the list of authorized end users of hazardous wastes along with MoU signed with them at least two months in advance prior to the commencement of production. In the absence of potential buyers of these items, the unit shall restrict the production of the respective items.

**A. 5. OTHER:**

31. The project proponent shall carry out the activities (Solar Street lights, Community plantation activity, Solar panels installation, Organic Waste Converters at schools & Village area) proposed under CER and it shall be part of the Environment Management Plan (EMP) as per the MoEF&CC's OM no. F. No. 22-65/2017-IA.III dated 30.09.2020. This shall be monitored and the monitoring report shall be submitted to the regional office of MoEF&CC as a part of half-yearly compliance report and to the District Collector. The monitoring report shall be posted on the website of the project proponent.
32. All the recommendations, mitigation measures, environmental protection measures and safeguards proposed in the EIA report of the project prepared by M/s. Earthcare Enviro Solutions Pvt. Ltd. and submitted by the project proponent and commitments made during presentation before SEAC and proposed in the EIA report shall be strictly adhered to in letter and spirit.

**B. GENERAL CONDITIONS:**

**B.1 CONSTRUCTION PHASE:**

33. Water demand during construction shall be reduced by use of curing agents, super plasticizers and other best construction practices.
34. Project proponent shall ensure that surrounding environment shall not be affected due to construction activity. Construction materials shall be covered during transportation and regular water sprinkling shall be done in vulnerable areas for controlling fugitive emission.
35. All required sanitary and hygienic measures shall be provided before starting the construction activities and to be maintained throughout the construction phase.
36. First Aid Box shall be made readily available in adequate quantity at all the times.
37. The project proponent shall strictly comply with the Building and other Construction Workers' (Regulation of Employment & Conditions of Service) Act 1996 and Gujarat rules made there under and their subsequent amendments. Local bye-laws of concern authority shall be complied in letter and spirit.
38. Ambient noise levels shall conform to residential standards both during day and night. Incremental pollution load on the ambient air and noise quality shall be closely monitored during construction phase.
39. Use of Diesel Generator (DG) sets during construction phase shall be strictly equipped with acoustic enclosure and shall conform to the EPA Rules for air and noise emission standards.
40. Safe disposal of waste water and municipal solid wastes generated during the construction phase shall be ensured.
41. All topsoil excavated during construction activity shall be used in horticultural / landscape development within the project site.
42. Excavated earth to be generated during the construction phase shall be utilized within the premises to the maximum extent possible and balance quantity of excavated earth shall be disposed off with the approval of the competent authority after taking the necessary precautions for general safety and health aspects. Disposal of the excavated earth during construction phase shall not create adverse effect on neighbouring communities.
43. Project proponent shall ensure use of eco-friendly building materials including fly ash bricks, fly ash paver blocks, Ready Mix Concrete [RMC] and lead free paints in the project.
44. Fly ash shall be used in construction wherever applicable as per provisions of Fly Ash Notification under the E.P. Act, 1986 and its subsequent amendments from time to time.
45. "Wind - breaker of appropriate height i.e. 1/3rd of the building height and maximum up to 10 meters shall be provided. Individual building within the project site shall also be provided with barricades.
46. "No uncovered vehicles carrying construction material and waste shall be permitted."
47. "No loose soil or sand or construction & demolition waste or any other construction material that cause dust shall be left uncovered. Uniform piling and proper storage of sand to avoid fugitive emissions shall be ensured."
48. Roads leading to or at construction site must be paved and blacktopped (i.e. - metallic roads).
49. No excavation of soil shall be carried out without adequate dust mitigation measures in place.
50. Dust mitigation measure shall be displayed prominently at the construction site for easy public viewing.
51. Grinding and cutting of building materials in open area shall be prohibited.
52. Construction material and waste should be stored only within earmarked area and road side storage of construction material and waste shall be prohibited.
53. Construction and demolition waste processing and disposal site shall be identified and required dust mitigation measures



be notified at the site. (If applicable).

## **B.2 OPERATION PHASE:**

### **B.2.1 WATER:**

54. The water meter shall be installed and records of daily and monthly water consumption shall be maintained.
55. All efforts shall be made to optimize water consumption by exploring Best Available Technology (BAT). The unit shall continuously strive to reduce, recycle and reuse the treated effluent.

### **B.2.2 AIR:**

56. In case of use of spray dryer, the unit shall provide the adequate & efficient APCMs with spray dryer so that there should not be any adverse impact on human health & environment. Unit shall carry out third party monitoring of the proposed Spray dryer & its APCM through the credible institutes and study report for impacts on Environment and Human Health shall be submitted to GPCB every year along with half yearly compliance report.
57. Acoustic enclosure shall be provided to the DG sets (If applicable) to mitigate the noise pollution and shall conform to the EPA Rules for air and noise emission standards.
58. Stack/Vents (Whichever is applicable) of adequate height shall be provided as per the prevailing norms for flue gas emission/Process gas emission.
59. Flue gas emission & Process gas emission (If any) shall conform to the standards prescribed by the GPCB/CPCB/MoEF&CC. At no time, emission level should go beyond the stipulated standards.
60. All the reactors / vessels used in the manufacturing process shall be closed to reduce the fugitive emission.

### **B.2.3 HAZARDOUS/SOLID WASTE:**

61. The company shall strictly comply with the rules and regulations with regards to handling and disposal of Hazardous waste in accordance with the Hazardous and Other Wastes (Management and Transboundary Movement) Rules 2016, as may be amended from time to time. Authorization of the GPCB shall be obtained for collection / treatment / storage / disposal of hazardous wastes.
62. Hazardous wastes shall be dried, packed and stored in separate designated hazardous waste storage facility with pucca bottom and leachate collection facility, before its disposal.
63. The unit shall obtain necessary permission from the nearby TSDF site and CHWIF. (Whichever is applicable)
64. Trucks/Tankers used for transportation of hazardous waste shall be in accordance with the provisions under the Motor Vehicle Act, 1988, and rules made there under.
65. The design of the Trucks/tankers shall be such that there is no spillage during transportation
66. All possible efforts shall be made for Co-Processing of the Hazardous waste prior to disposal into TSDF/CHWIF.
67. Management of fly ash (If any) shall be as per the Fly ash Notification 2009 & its amendment time to time and it shall be ensured that there is 100% utilization of fly ash to be generated from the unit.

### **B.2.4 SAFETY:**

68. The occupier/manager shall strictly comply the provisions under the Factories Act 1948 and the Gujarat Factories Rules 1963
69. The project authorities shall strictly comply with the provisions made in Manufacture, Storage and Import of Hazardous Chemicals Rules (MSIHC) 1989, as amended time to time and the Public Liability Insurance Act for handling of hazardous chemicals etc. Necessary approvals from the Chief Controller of Explosives and concerned Govt. Authorities shall be obtained before commissioning of the project. Requisite On-site and Off-site Disaster Management Plans have to be prepared and implemented.
70. Main entry and exit shall be separate and clearly marked in the facility.
71. Sufficient peripheral open passage shall be kept in the margin area for free movement of fire tender/ emergency vehicle around the premises.
72. Storage of flammable chemicals shall be sufficiently away from the production area.
73. Sufficient number of fire extinguishers shall be provided near the plant and storage area.
74. All necessary precautionary measures shall be taken to avoid any kind of accident during storage and handling of toxic / hazardous chemicals.
75. All the toxic/hazardous chemicals shall be stored in optimum quantity and all necessary permissions in this regard shall be obtained before commencing the expansion activities.
76. The project management shall ensure to comply with all the environment protection measures, risk mitigation measures and safeguards mentioned in the Risk Assessment report.
77. Only flame proof electrical fittings shall be provided in the plant premises.
78. Storage of hazardous chemicals shall be minimized and it shall be in multiple small capacity tanks / containers instead of one single large capacity tank / containers.
79. All the storage tanks shall be fitted with appropriate controls to avoid any leakages. Bund/dyke walls shall be provided for storage tanks for Hazardous Chemicals.
80. Handling and charging of the chemicals shall be done in closed manner by pumping or by vacuum transfer so that minimal human exposure occurs.

81. Tie up shall be done with nearby health care unit / doctor for seeking immediate medical attention in the case of emergency.
82. Personal Protective Equipments (PPEs) shall be provided to workers and its usage shall be ensured and supervised.
83. First Aid Box and required Antidotes for the chemicals used in the unit shall be made readily available in adequate quantity.
84. Training shall be imparted to all the workers on safety and health aspects of chemicals handling.
85. Occupational health surveillance of the workers shall be done and its records shall be maintained. Pre-employment and periodical medical examination for all the workers shall be undertaken as per the Factories Act & Rules.
86. Transportation of hazardous chemicals shall be done as per the provisions of the Motor Vehicle Act & Rules.
87. The company shall implement all preventive and mitigation measures suggested in the Risk Assessment Report.
88. Necessary permissions from various statutory authorities like PESO, Factory Inspectorate and others shall be obtained prior to commissioning of the project.

#### **B.2.5 NOISE:**

89. The overall noise level in and around the plant area shall be kept well within the standards by providing noise control measures including engineering controls like acoustic insulation hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise level shall conform to the standards prescribed under The Environment (Protection) Act, 1986 & Rules.

#### **B.2.6 CLEANER PRODUCTION AND WASTE MINIMISATION:**

90. The unit shall undertake the Cleaner Production Assessment study through a reputed institute / organization and shall form a CP team in the company. The recommendations thereof along with the compliance shall be furnished to the GPCB.
91. The company shall undertake various waste minimization measures such as :
  - a. Metering and control of quantities of active ingredients to minimize waste.
  - b. Reuse of by-products from the process as raw materials or as raw materials substitutes.
  - c. Use of automated and close filling to minimize spillages.
  - d. Use of close feed system into batch reactors.
  - e. Venting equipment through vapour recovery system.
  - f. Use of high pressure hoses for cleaning to reduce wastewater generation.
  - g. Recycling of washes to subsequent batches.
  - h. Recycling of steam condensate.
  - i. Sweeping / mopping of floor instead of floor washing to avoid effluent generation.
  - j. Regular preventive maintenance for avoiding leakage, spillage etc.

#### **B.2.7 GREEN BELT AND OTHER PLANTATION:**

92. The unit shall develop green belt within premises as per the CPCB guidelines. However, if the adequate land is not available within the premises, the unit shall take up adequate plantation on road sides and suitable open areas in GIDC estate or any other open areas in consultation with the GIDC / GPCB and submit an action plan of plantation for next three years to the GPCB.
93. Drip irrigation / low-volume, low-angle sprinkler system shall be used for the green belt development within the premises.
94. The PP shall develop green belt 9376.93 m<sup>2</sup> (13.78%) inside plant premises for the proposed. Green belt shall be developed with native plant species that are significant and used for the pollution abatement as per the CPCB guidelines. It shall be implemented within 3 years of operation phase in consultation with GPCB.

#### **B.3 OTHER CONDITION:**

95. PP shall ensure that the COD / VOC in feed water shall not get air borne from the in house MEE.
96. Project proponent shall install all environment management systems as per the CPCB/GPCB directives regarding the effluent discharge and air emission in working condition.
97. Project proponent shall display the copy of Environment Clearance at the site prominently.
98. Project proponent shall prepare and follow regular and preventive maintenance plan. The copy of same shall be submitted to SEIAA.
99. Project Proponent will have to display the safety procedure in working area.
100. The project proponent shall obtain all required permissions for safety, health and fire from competent authorities like PESO/Fire Authority etc. and intimate SEIAA.
101. Project Proponent will intimate SEIAA/SEAC/GPCB after obtaining the membership of common facilities like CETP / TSD / CHWIF / CMEE / Common Spray Dryer as the case may be.
102. Extra care will be taken by PP to avoid any accidental blast in boiler, reactor or any machinery in the plant.
103. Environment monitoring, training and disaster management plan should be undertaken and complied at regular interval.
104. Integrated Regional Office of MoEF&CC, Gandhinagar and GPCB will monitor all environment, safety & health norms as per the prevailing rules.
105. Unit shall comply all the applicable standard conditions prescribed in Office Memorandum (OM) published by MoEF&CC

- vide no. F. No. 22-34/2018-IA.III dated 09/08/2018 for Pharmaceutical and Chemical industries mentioned at (Sr. no. XX).
106. The project proponent shall allocate the separate fund for Corporate Environment Responsibility (CER) in accordance to the MoEFCC's Office Memorandum No. F.No.22-65/2017-IA.III dated 01/05/2018 to carry out the activities under CER in affected area around the project. The entire activities proposed under CER shall be monitored and the monitoring report shall be submitted to the regional office of MoEFCC as a part of half-yearly compliance report and to district collector. The monitoring report shall be posted on the website of the project proponent.
  107. Rain water harvesting of surface as well as rooftop runoff shall be undertaken and the same water shall be used for the various activities of the project to conserve fresh water as well as to recharge ground water. Before recharging the surface run off, pre-treatment must be done to remove suspended matter.
  108. The unit shall join and participate financially and technically for any common environmental facility / infrastructure as and when the same is taken up either by the Industrial Association or GIDC or GPCB or any such authority created for this purpose by the Govt. / GIDC.
  109. Application of solar energy shall be incorporated for illumination of common areas, lighting for gardens and street lighting in addition the provision for solar water heating system shall also be provided.
  110. The area earmarked as green area shall be used only for plantation and shall not be altered for any other purpose.
  111. All the commitments / undertakings given to the SEAC during the appraisal process for the purpose of environmental protection and management shall be strictly adhered to.
  112. The project proponent shall also comply with any additional condition that may be imposed by the SEAC or the SEIAA or any other competent authority for the purpose for the environmental protection and management.
  113. In the event of failure of any pollution control system adopted by the unit, the unit shall be safely closed down and shall not be restarted until the desired efficiency of the control equipment has been achieved.
  114. The project authorities must strictly adhere to the stipulations made by the Gujarat Pollution Control Board (GPCB), State Government and any statutory authority.
  115. During material transfer there shall be no spillages and gulland drain shall be constructed to avoid mixing of accidental spillages with domestic wastewater or storm water.
  116. Pucca flooring / impervious layer shall be provided in the work areas, chemical storage areas and chemical handling areas to minimize soil contamination.
  117. Leakages from pipes, pumps shall be minimal and if occurs, shall be arrested promptly.
  118. No further expansion or modifications in the plant likely to cause environmental impacts shall be carried out without obtaining prior Environment Clearance from the concerned authority.
  119. The above conditions will be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2008 and the Public Liability Insurance Act, 1991 along with their amendments and rules.
  120. The project proponent shall comply all the conditions mentioned in "The Companies (Corporate Social Responsibility Policy) Rules, 2014" and its amendments from time to time in a letter and spirit.
  121. The project management shall ensure that unit complies with all the environment protection measures, risk mitigation measures and safeguards recommended in the EMP report and Risk Assessment study report as well as proposed by project proponent.
  122. The project authorities shall earmark adequate funds to implement the conditions stipulated by SEIAA as well as GPCB along with the implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purpose.
  123. The applicant shall inform the public that the project has been accorded environmental clearance by the SEIAA and that the copies of the clearance letter are available with the GPCB and may also be seen at the Website of SEIAA/ SEAC/ GPCB. This shall be advertised within seven days from the date of the clearance letter, in at least two local newspapers that are widely circulated in the region, one of which shall be in the Gujarati language and the other in English. A copy each of the same shall be forwarded to the concerned Regional Office of the Ministry.
  124. It shall be mandatory for the project management to submit half-yearly compliance report in respect of the stipulated prior environmental clearance terms and conditions in soft copies to the regulatory authority concerned, on 1st June and 1st December of each calendar year.
  125. Concealing factual data or submission of false/fabricated data and failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of Environment (Protection) Act, 1986.
  126. The project authorities shall also adhere to the stipulations made by the Gujarat Pollution Control Board.
  127. The SEIAA may revoke or suspend the clearance, if implementation of any of the above conditions is not found satisfactory.
  128. The company in a time bound manner shall implement these conditions. The SEIAA reserves the right to stipulate

additional conditions, if the same is found necessary.

129. The project authorities shall inform the GPCB, Regional Office of MoEF and SEIAA about the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.

130. This environmental clearance is valid for seven years from the date of issue.

131. Any appeal against this environmental clearance shall lie with the National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.

132. Submission of any false or misleading information or data which is material to screening or scoping or appraisal or decision on the application makes this environment clearance cancelled.

**B.4 COMPLIANCE OF ENVIRONMENT CLEARANCE/REPORTING/ADMINISTRATION/APPEAL:**

133. Project proponent shall inform to all the concerned authorities including Municipal Corporation and District Collector and shall also give wide publicity through advertisement in minimum two local newspapers within seven days, about the Environment Clearance order accorded.

134. Project proponent shall appoint a key person in the organization who shall be responsible for compliance of above condition fully on behalf of the proponent. It will not mean that appointing a key person will exempt the project proponent from the responsibility of compliance. Any change in key person shall immediately be informed to SEIAA and all concerned authorities.

135. Designated key person shall submit six monthly compliance report to SEIAA/SEAC, MOEF&CC, GPCB and Nodal Department of the Government.

136. The Nodal Department or any authority or officer authorized by MOEF&CC/SEIAA can inspect the site of the project and all the facilities, for verification of compliances of environment clearance conditions.

137. In case of violation reported upon, the project proponent shall be responsible for all the legal actions as per Environment Protection Act, 1986 including SEIAA may cancel, withdraw or keep in abeyance, the Environment Clearance accorded.

138. Any person including the project proponent affected by this Environment Clearance order may file appeal to Honorable National Green Tribunal West Zone branch, Pune, preferably within a period of thirty days from the date of issue of Environment Clearance as prescribe under section 16 of National Green Tribunal Act 2010.

139. All complains and public grievance or representations may be addressed to SEIAA/SEAC in the email addresses (a) msseiaagj@gmail.com & (b) seacgujarat@gmail.com

With regards,  
Yours sincerely,

  
(S. J. PANDIT)  
Member Secretary

Issued to:  
M/s. SML Films Limited  
Plot No: A-17/1, A-17/2, A-10/2, A-16/2 & A-11/2,  
Sector - A, Ichhapore - Bhatpore GIDC Estate,  
Vill: Bhatpore, Tal: Choryasi,  
Dist: Surat - 394 510 State: Gujarat

Copy to:-

1. The Secretary, SEAC, C/O. G.P.C.B. Gandhinagar - 382010.
2. The Additional Chief Secretary, Forests & Environment Department, Govt. of Gujarat, Block 14, 8th floor, Sachivalaya, Gandhinagar-382010.
3. The Chairman, Central Pollution Control Board, Parivesh Bhavan, CBD -cum-Office Complex, East Arjun Nagar, New Delhi-110032
4. Scientist C, Integrated Regional Office, Ministry of Environment and Forests, Aranya Bhavan, Sector-10, Gandhinagar - 382010.
5. Monitoring Cell, Ministry of Environment and Forests, Paryavaran Bhavan, CGO Complex, New Delhi-110003.
6. The Member Secretary, Gujarat Pollution Control Board, Paryavaran Bhavan, Sector-10 A, Gandhinagar-382010
7. Select File



Annexure-B  
**GUJARAT POLLUTION CONTROL BOARD**

PARYAVARAN BHAVAN  
Sector-10-A, Gandhinagar-382 010  
Phone : (079) 23226295  
Fax : (079) 23232156  
Website : www.gpcb.gov.in

BY R.P.A.D.

**CLOSURE DIRECTION UNDER SECTION-5 OF ENVIRONMENT (PROTECTION) ACT-1986 FOR THE VIOLATIONS OF THE HAZARDOUS & OTHER WASTE (MANAGEMENT & TRANSBOUNDARY MOVEMENT) RULES -2016 AS AMENDED FROM TIME TO TIME**

WHEREAS M/s. SML Films Limited, Plot No: A/10/2, A/16/2, A-71/1, Sector-A, Icchapore-Bhatpor GIDC Estate, Bhatpore, Tal:- Chorasi, Dist:- Surat.

AND WHEREAS, during the inspection of your industry on 24/03/2021 under Section-10 of EPA-1986, it was observed that:

- i. You have started construction work and installation of new plant machineries at Plot No. A-17/2. It is observed that you have installed two MS storage tank having capacity of 1000 KL each (above ground), installed REG (Refresh Ethylon Glycol) collection vessel, about 6 numbers of heat exchangers, also one reaction vessel and other machineries observed within premises. As per installed REG (Refresh Ethylene Glycol) collection vessel and other reaction vessel, it shows You have started installation of Polyester Chips manufacturing plant and there may be applicability of EIA Notification for same activities.
- ii. During visit it was observed that You have installed new coal based TFH (capacity 6000 U) and was found in operation. ESP followed by water scrubber is provided as APCM. Unit has not obtained CCA amendment for new installed 6000 U – TFH.

AND WHEREAS legal Notice was issued on 06/03/2021 for Violation of EIA Notification.

AND WHEREAS the non-compliance found during the visit seems severe and may damage environment adversely.

*Clean Gujarat Green Gujarat*

ISO - 9001 - 2008 & ISO - 14001 - 2004 Certified Organisation



GPCB

# GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar-382 010

Phone : (079) 23226295

Fax : (079) 23232156

Website : www.gpcb.gov.in

## COPY TO:

1. Managing Director,  
Dakshin Gujarat Vij Co. Ltd.  
Nana Varachha Road,  
Kapodara, Surat-395 006,  
Dist. Surat .....With a request to disconnect the electricity supply of the  
unit **M/s. SML Films Limited** with **15 days' effect** from the  
date of issue of this order & intimate to us accordingly.
2. The Executive Engineer, (O&M)  
D.G.V.C.L.,  
Ichhapor, SDN Office,  
Near ONGC Char Rasta, Ichhapor,  
Dist: Surat,.....With a request to disconnect the electricity supply of the  
unit **M/s. SML Films Limited** with **15 days' effect** from the  
date of issue of this order & intimate to us accordingly.
3. Regional Officer,  
Gujarat Pollution Control Board,  
Regional Office,  
Surat, .....follow up for compliance of this direction & send IR.

For and on behalf of  
Gujarat Pollution Control Board

(A.V. SHAH)

MEMBER SECRETARY

*Clean Gujarat Green Gujarat*

ISO - 9001 - 2008 & ISO - 14001 - 2004 Certified Organisation

Outward No.: 588788, 23/04/2021



# GUJARAT POLLUTION CONTROL BOARD

PARYAVARAN BHAVAN

Sector-10-A, Gandhinagar-382 010

Phone : (079) 23226295

Fax : (079) 23232156

Website : [www.gpcb.gov.in](http://www.gpcb.gov.in)

**REVOCATION OF CLOSURE DIRECTION ISSUED UNDER SECTION-5 OF ENVIRONMENT (PROTECTION) ACT- 1986 FOR THE VIOLATIONS OF THE HAZARDOUS & OTHER WASTE (MANAGEMENT & TRANSBOUNDARY MOVEMENT) RULES -2016 AS AMENDED FROM TIME TO TIME**

WHEREAS M/s. SML Films Limited, Plot No: A/10/2, A/16/2, A-71/1, Sector-A, Icchapore-Bhatpor GIDC Estate, Bhatpore, Tal:- Chorasi, Dist:- Surat.

AND WHEREAS the Gujarat Pollution Control Board has granted you consent under the provisions of the Environmental Acts/Rules by its consent Order No.90711 dated 25/01/2018 which is valid up to 07/11/2022 for operation of the industrial plant with specific terms & conditions.

AND WHEREAS closure direction was issued under Section-5 of Environment (Protection) Act- 1986, as amended from time to time vide letter No. GPCB/CCA-SRT-1385/ ID- 30733/588788 dated 23/04/2021.

AND WHEREAS, during the inspection of your industrial plant on 25/05/2021 by the authorized officer of the Board, and observed that:

1. Unit has started construction work and installation of new plant machineries at plot No A-17/2 for proposed expansion.
2. Installed two MS storage tank having capacity of 1000 KL each (above ground) is use for fire extinguisher purpose and they have also applied for permission of SMC for same.
3. Unit has removed installed REG (Refresh Ethylon Glycol) collection vessel and all heat exchangers.
4. They also removed reaction vessel and other machineries from the premises which were observed during earlier visit. Unit has provided total four FO based TFH which are found not in operation.

AND WHEREAS you have submitted undertaking dated 26/04/2021 for compliance.

AND WHEREAS you have submitted the Bank Guarantee of Rs. 20 lakhs of HDFC Bank Ltd, valid upto 27/04/2023.

AND WHEREAS you have submitted Rs. 20 lakhs as Interim Environment Damage Compensation to the Board vide RTGS transfer UTR No: HDFCR52021062499249898.

1

*Clean Gujarat Green Gujarat*

ISO - 9001 - 2008 & ISO - 14001 - 2004 Certified Organisation

Outward No: 593398, 26/06/2021

**ORDER**

Under the above circumstances, I, **A.V.Shah, Member Secretary, Gujarat Pollution Control Board**, in exercise of the power conferred under file No. Legal -G-28, for under Section-5 of Environment (Protection) Act-1986, is directed to revoke the closure order issued vide letter no. GPCB/CCA-SRT-1385/ ID- 30733/588788 dated 23/04/2021 for 3 months from the date of issue of order with following conditions

1. To check performance of industry and comply with CCA condition.

**For and on behalf of  
Gujarat Pollution Control Board,**



**(A. V. Shah)**

**Member Secretary**

Date:

NO: GPCB/CCA-SRT-1385/ID\_30733/

To,

M/s. SML Films Limited

Plot No:- A/10/2, A/16/2, A-71/1, Sector-A,

Ichhapore-Bhatpor GIDC Estate,

Bhatpore,

Tal:- Chorasi, Dist:- Surat.

**COPY TO: -**

- 1) **Managing Director.**  
Dakshin Gujarat Vij Co. Ltd.  
Nana Varachha Road,  
Kapodara, Surat-395 006,  
Dist. Surat .....

.....With a request to continue the supply of Electricity for 3 Months from the issue date of this order to the industrial plant of M/s. SML Films Limited, Plot No:- A/10/2, A/16/2, A-71/1, Sector-A, Ichhapore-Bhatpor GIDC Estate, Bhatpore, Tal:- Chorasi, Dist:- Surat. and intimate to us accordingly.

- 2) **The Executive Engineer, (O&M)**  
D.G.V.C.L.,  
Ichhapor, SDN Office,  
Near ONGC Char Rasta, Ichhapor,  
Dist: Surat,.....

.....With a request to continue the supply of Electricity for 3 Months from the issue date of this order to the industrial plant of M/s. SML Films Limited, Plot No:- A/10/2, A/16/2, A-71/1, Sector-A, Ichhapore-Bhatpor GIDC Estate, Bhatpore, Tal:- Chorasi, Dist:- Surat. and intimate to us accordingly.

**For and on behalf of  
Gujarat Pollution Control Board,**



**(A. V. Shah)**  
**Member Secretary**

**Show Cause Notice**

WHEREAS you are having industrial unit at Plot No. A-17/1, A-16/2, A-10/2, 11/2, A-17/2.

AND WHEREAS, during visit of your location on 25/02/2022 by Board Officials, it was observed that:

- You have sold your lumps waste to industries, who have not obtained necessary permission of the Board.

In view of the above, you are called upon to show cause within 7 days why legal action should not be initiated against your school and open plot for contravening the provision of the Air Act 1981.

For and on behalf of  
Gujarat Pollution Control Board

*Jiga*

(Dr. J. D. Oza)

I/C Regional Officer – Surat

NO: GPCB/RO-Surat/C-1/ID – 30733/ 7458

Date: 26 APR 2022

Issued To,  
SML Films Ltd. (Formally Known-Surat Metallica Limited),  
Plot No. A-17/1, A-16/2, A-10/2, 11/2, A-17/2.,  
GIDC Ichhapore, Surat.

Copy to:

1. Unit Head, Surat  
Sector 10-A, Parvavaran Bhavan  
Gandhinagar – 382010.....

.....for information please.

*o/c*  
*B. B. B.*  
*26/04/22*

**Visit Report of M/s SML Films Ltd., Ichhapore, Taluka Chorasi, Dist. Surat, Gujarat in reference to Hon'ble NGT Matter O.A. No. 438/2021.**

This unit is visited with reference to Hon'ble NGT original application 438/2021 order dated 09-05-2022. Earlier this unit is visited on 25-02-2022 with joint committee. Detailed inspection report is submitted to Hon'ble NGT. Hon'ble NGT has given direction to file further action taken report for following point "Coal was being used as fuel; nothing is mentioned about generation and disposal of fly ash. Further, require EC has not been obtained. Since operation of the unit in question is in violation of requirement of EC, the state PCB has to take further action against such illegal operations, following due process of law".

Unit is engaged in the manufacturing BOPET film/polyester film-5700MT/Month, metalized (BOPET) polyester film-2000MT/Month, CCA valid up to 07-11-2022. During visit unit is found in operation.

During visit it is observed that foundation work of chips plant, utilities work & raw material storage silos installation work is going on at plot no. A-17/2.

Unit has obtained CTE amendment for Bi-axially oriented film (BOPET film/polyester film)-16700MT/Month, Metallized polyester film-3000MT/Month, BOPP fil-4500MT/Month, Metallized (BOPET) Poly Propylene Film-500MT/Month for which does not attract EC. Besides these products, the unit has proposed for production of polyester chips plant which attract the provision of EIA Notification 2006. Unit has obtained EC for proposed polyester chips plant – 12000MT/Month vide letter no. SEIAA/GUJ/EC/5(d)/578/2022 dated 28/02/2022.

Unit has installed one Thermic Fluid Heater (TFH) of capacity 6000 U for their existing production plant with ESP followed by wet scrubber as an APCM which are found in operation during visit. Coal is used as fuel in Thermic Fluid Heater (TFH). Unit has submitted details of fly ash generation and disposal details i.e. Total 234.08MT fly ash generation from June-2021 to May 2022 and disposed 232.45 MT fly ash to Madhav Bricks, Near Khodiyar Mataji Mandir, Hazira Road, Variyav, Surat. Fly ash generation and disposal details are attached herewith annexure –I. During visit, fly ash stock @ 1.5 MT is observed in storage area (Photographs attached herewith). Unit has stated that Madhav bricks is engaged in manufacturing of only fly ash bricks hence falls under white category.

Provided two fire water tanks (red color) at plot no. A-17/2 is observed empty. No further pipeline connection is observed as unit has not started production at plot no. A-17/2. After completion of construction work of chips plant and BOPET films , they will started utility of those 2 Nos. of fire water tanks for proposed plant. Moreover, in EC application 2 Nos. of fire tanks is already mentioned. Unit has obtained NOC/Opinion of fire & emergency department for high rise industrial building from Surat Municipal Corporation (Attached herewith as annexure - A).



B.C. Gosai  
A.E.E.

-sd-

R.N.Patel  
S.S.O.



fly ash stock @ 1.5 MT is observed in storage area



## SML FILMS LIMITED

Plot No. A/17-1, 16/2, 10/2,  
Ichhapur-Bhatpur G.I.D.C.,  
Nr. 220KV Getco Sub-Station,  
Ichhapur, SURAT - 394510.  
Ph. : +91-261-2309600  
CIN No. - U24119GZ002PLC009936

### ANNEXURE-I

#### DETAILS OF FLY ASH GENERATION AND DISPOSAL

MONTH	FLY ASH GENERATION	DATE	FLY ASH DISPOSAL(MT)	CH.NO.	NAME OF PARTY	VEHICLE NO.
Jun-21	4.12					
Jul-21	25.72	7/7/2021	8.14	7	Madhav Bricks	GJ-01 BY 5019
		19/07/2021	6.2	11	Madhav Bricks	GJ-05 AU 3888
		30/07/2021	6.35	16	Madhav Bricks	GJ-01 BY 5019
Aug-21	22.23	9/8/2021	8.31	21	Madhav Bricks	GJ-05 AU 3888
		20/08/2021	6.9	27	Madhav Bricks	GJ-05 AU 3888
		28/08/2021	7.32	32	Madhav Bricks	GJ-01 BY 5019
Sep-21	22.23	6/9/2021	7.5	38	Madhav Bricks	GJ-05 AU 3888
		16/09/2021	8.41	43	Madhav Bricks	GJ-01 BY 5019
Oct-21	26.86	1/10/2021	8.1	48	Madhav Bricks	GJ-01 BY 5019
		8/10/2021	9.2	54	Madhav Bricks	GJ-05 AU 3888
		16/10/2021	7.5	59	Madhav Bricks	GJ-01 BY 5019
		26/10/2021	8.6	64	Madhav Bricks	GJ-05 AU 3888
Nov-21	24.32	9/11/2021	8.23	68	Madhav Bricks	GJ-01 BY 5019
		20/11/2021	8.43	76	Madhav Bricks	GJ-05 AU 3888
		29/11/2021	7.52	82	Madhav Bricks	GJ-05 AU 3888
Dec-21	23.96	11/12/2021	8.75	88	Madhav Bricks	GJ-01 BY 5019
		20/12/2021	8.23	94	Madhav Bricks	GJ-05 AU 3888
Jan-22	24.2	1/1/2021	7.61	101	Madhav Bricks	GJ-01 BY 5019
		11/1/2021	8.96	109	Madhav Bricks	GJ-05 AU 3888
		25/01/2021	8.93	116	Madhav Bricks	GJ-01 BY 5019
		30/01/2022	8.57	121	Madhav Bricks	GJ-01 BY 5019
Feb-22	22.2	10/2/2022	8.3	128	Madhav Bricks	GJ-05 AU 3888
		18/02/2022	7.95	134	Madhav Bricks	GJ-05 AU 3888
		26/02/2022	8.83	142	Madhav Bricks	GJ-01 BY 5019
Mar-22	23.5	8/3/2022	8.48	147	Madhav Bricks	GJ-05 AU 3888
		22/03/2022	7.53	155	Madhav Bricks	GJ-01 BY 5019
		31/03/2022	8.25	161	Madhav Bricks	GJ-01 BY 5019
Apr-22	7.64	9/4/2022	8.35	6	Madhav Bricks	GJ-05 AU 3888
May-22	7.1	16/05/2022	6.99	12	Madhav Bricks	GJ-01 BY 5019
<b>Total</b>	<b>234.08</b>		<b>232.45</b>			



Fly Ash Last Disposal Challan

DELIVERY CHALLAN				
 <b>SML FILMS LIMITED</b> Plot No. : A/17-1, A/18-2, A/19-2, A/11-2, A/17-2, A/18-3, Ichhapore-Bhatpore, GDC, Surat - 394230 GSTIN : 24AAGCS6017G1ZJ				
To: MADHAV BRICKS At: Khatiyas, Madhav Vinod 24/10/19 Road, V43134V Surat.		Delivery Challan No. :	07	
		Date	16/12/2021	
		NRGP / RGP No.	NRGP	
		Vehicle No.	GT-01 RV-501	
		Name of Transporter		
Sr. No.	Description of Material	UOM	QUANTITY	REMARKS
1	Flyash	MT	6.39	Free of cost No commercial value.
FOR MADHAV BRICKS Partner Partner's Signature / Stamp		For SML FILMS LIMITED  Authorized Signatory		

**SML****SML FILMS LIMITED**

Plot No. A-17-1, 16/2, 10/2,  
 Ichhapur Bhatpur G.I.I.C.,  
 W. 220KV Gesso Sub-Station,  
 Ichhapur, SURAT - 394510.  
 Ph. +91-261-2309600  
 CIN No. U24196GJ2002PLC010916

May, 2022

GPCB ID: 30733

To,  
 The Member/Secretary,  
 Gujarat Pollution Control Board  
 Paryavaran Bhavan, Sector-10/A,  
 Gandhinagar -382 010.

<b>INWARD</b>
No. <u>49650</u>
Date: <u>24/05/2022</u>
G.P.C. BOARD, SURAT.

**SUB: CLARIFICATION REGARDING YOUR VISIT AT OUR INDUSTRIAL UNIT**  
**REF.: YOUR LETTER NO.: NIL DATED: 18/05/2022**

Respected Sir,

With reference to above subject matter, we would like to submit point wise clarification as under...

**Q.1 "During Visit In your Unit Production Activity is shown as working condition."**

- During the visit whatever production activity was going on as per our existing CC&A order No. AWH-90711 Issue on Dated: 25/01/2018 valid upto: 07/11/2022 and CC&A-Amendment Order No.AH-113174 issue on Dated: 07/06/2021 valid upto: 07/11/2022.

**Q.2 "At the time of visit Chips plant's civil work (foundation work), utilities work and Installation of raw material storage silos shown in working condition at plot no: A-17/2."**

- We would like to inform you that we have already obtained EC as per letter No. SEIAA/GUJ/EC/5(d)/578/2022 issued on dated: 28-Feb-2022 from the SEIAA and also got CTE-Amendment [TOR to CTE] from the Board for the Polyester Chips plant at Plot No. A-17/2 and at the time of the visit, foundation work was going on for the same.
- Furthermore, The Utilities work and installation work of raw material storage silos were in working condition at Plot No. A-17/2 for the BOPET films which is NON-EC attracts product and we have obtained CTE-Amendment as per Order No. GPCB/CCA-SRT-1385/ID\_30733/574067 issued on dated 27/11/2020 from the Board for the same.

**Q.3 "2 Nos. of Fire water tank (Red color) was shown empty during visit."**

- We want to inform you that we have provided 2 Nos. of Fire water tanks for our proposed plant which is under construction phase. After completion of the construction work of Chips Plant and BOPET Films Plant, we will be started utility of those 2 Nos. of Fire water tanks for our proposed Plant. Moreover, in our EC Application 2 Nos. of Fire tanks is already mentioned. At present we have already provided separate Fire water tanks for our Existing Plant which is filled with Water.
- Moreover, we are herewith attached Fire safety certificate from SMC as per Annexure-A.

**Q.4 "At the time of visit TFH-6000 U is shown in working condition and imported coal is used as fuel."**

- We have valid CC&A for the operation of TFH-6000 U and using fuel as Imported Coal for the same. Our CC&A- Amendment Order No.AH-113174 issue on Dated: 07/06/2021 valid upto: 07/11/2022.

RMP/BCA  
 JSC  
 24/5/22





## SML FILMS LIMITED

Plot No. A/17-C, 16/2, 16/4,  
Jinhapor-Bhatpor G.P.D.C.,  
Nr. 220RV Getce Sub-Station,  
Jinhapor, SURAT - 394510.  
Ph. : +91-261 2308600  
CIN No. : U24129GJ2002PLC040936

**Q.5 "Unit has to follow notification of fly ash and submit the details of fly ash generation and disposal with relevant documents."**

- Fly Ash generated from our unit is disposed to Fly Ash Brick Manufacturer Unit and the detail of the same is attached as per Annexure-I. We follow notification of fly ash.
- Moreover, Fly Ash Brick Manufacturer is falling under white Category, so that they don't have consent of GPCB.

We hope you will be satisfied from our above clarification & may humbly request you to consider this detail, and oblige us.

Thanking You,

Yours Faithfully,



For SML FILMS LIMITED

*[Signature]*  
AUTHORIZED SIGNATORY

\*cc: To,

The Regional Officer,  
Gujarat Pollution Control Board  
238, Typical First Floor, Belgium Square,  
Ring Road, Surat - 395 003.



SURAT MUNICIPAL CORPORATION  
FIRE & EMERGENCY SERVICES  
HEAD QUATERS, MUGLISARA,  
SURAT - 395003

Ph.: S.M.C. : 0261 - 2423750 TO 56, CONTROL : 2414195 -96, FAX : 2451935, 9724345553

To,  
Director,  
SML Films Limited,  
Ichhapor-Bhatpor G.I.D.C.,  
Surat.

**Sub:-** N.O.C./OPINION Fire & Emergency Services Dept. for High Rise Industrial Building.

**Reference :-** A letter from Applicant Shri bearing FES/N.O.C/Inward No. 1390, Date. 01/07/2021.

**PROPOSED SITE :-** PROPOSED INDUSTRIAL FACTORY PLAN AT PLOT NO. A/17/2, ICHHAPORE - BHATPORE G.I.D.C., SURAT.

Submitted,

As per said plan the above building is a High Rise Industrial Type. B [Godown] (Ground Floor + 1st Floor ) with Height of 14.50 Mtrs., Type. C [TFH Plant] (Ground Floor + 2nd Floor ) with Height of 13.00 Mtrs., Type. D [Plant] (Ground Floor + 3rd Floor ) with Height of 28.50 Mtrs., Type. E [Film Plant] (Ground Floor + 1st Floor ) with Height of 14.50 Mtrs.

As per N.B.C. 2016 the aforesaid buildings are to be considered as High Rise Industrial Building. Hence this dept. has No Objection if the applicant concerned makes necessary fire fighting arrangement in said building as per N.B.C. norms, Existing CGDCR norms, Gujarat Fire Prevention Life Safety Regulation 2017 and Submitted Drawing. Subject to compliance of following fire safety recommendations by the developer/owner during & after construction. The administrative charge of Rs.3000 x 4 = Rs. 12,000/- has been recovered vide Receipt No.161/5, Dated. 02/07/2021.

1. Parking shall not be permitted in courtyards and drive ways of fire appliances.
2. Courtyard shall be kept free from encumbrances & encroachments.
3. No structure of any type shall be permitted in courtyard of the building.
4. There shall not be any trees obstructing fire appliances reach in compulsory open spaces required as per CGDCR.
5. Repairing/servicing of cars, use of naked light shall not be permitted in the car parking areas.
6. Dwelling, use of naked light / flame, repairing / maintenance of vehicles shall be strictly prohibited in the parking area.
7. The driveways shall be property marked and maintained unobstructed, proper illuminated signage shall be provided for escape route.
8. Car parking shall be permitted in the designated area only.
9. The fins with RCC, brick work, hallow blocks or any such construction materials shall

Page | 1

not be permitted.

10. The driveways shall be properly marked and maintained unobstructed, proper illuminated signage shall be provided for escape route, car lifts, etc. at prominent location.
11. The layout of staircase shall be enclosed type throughout its height and shall be approached at each floor level.
12. Externally located staircases adequately ventilated to outside air.
13. Permanent vent at the top equal to 5 % of the cross sectional area of the staircase shall be provided.
14. Structural steel members connected to staircase shall be protected with fire retardant coatings.
15. No combustibles shall be kept or stored in staircase / passages.
16. The staircase should not be encroached by shoe-rack, decorative items, earthen pots etc.
17. Walls enclosing lift shaft shall have a fire resistance of not less than two hours.
18. Shaft shall have permanent vent of not less than 0.2 sq. meters in clear area immediately under the machine room.
19. Landing door and lift car door of the lifts shall be of steel shuttered with fire resistance of one hour. No collapsible shutter shall be permitted.
20. The Fire lift shall have a floor area of not less than 1.4 sq. meters it shall have loading capacity of not less than 545 kgs (8 persons lift) with automatic closing doors of minimum 0.8 m. width.
21. The electric supply of fire lift shall be on a separate service from electric supply mains in a building and the cables run in a route safe from fire i.e. within the lift shaft. Light & fans in the elevators having wooden paneling or sheet steel construction shall be operated on 24 volt supply.
22. Fire lift should be provided with a ceiling hatch for use in case for emergency. So that when the car gets stuck up, it shall be easily openable.
23. In case of failure normal electric supply, it shall automatically changeover to alternate supply. For apartment houses, this changeover of supply could be done through manually operated changeover switch. Alternatively, the lift shall be so wired that in case of power failure, it comes down at the ground level and comes to stand-still with door open.
24. The operation of fire lift should be by a simple toggle or two button switch situated in glass-fronted box adjacent to the lift at the entrance level. When the switch is on, landing call point will become inoperative and the lift will be on car control only or on a priority control devices. When the switch is off, the lift will return to normal working. This lift can be used by the occupants in normal times.
25. The words 'fire lift' shall be conspicuously displayed in fluorescent paints on the lift landing doors at each floor level.
26. The speed of the fire lift shall be such that it can reach the top floor from ground level within one minute. Fire lift shall be constructed as per prevailing standard.
27. Corridor / lift lobby at each floor level shall be naturally ventilated as shown in plan for the upper floors.
28. The common corridor / lift lobby at each floor level shall be kept free from obstruction at all times.
29. Self-glowing / fluorescent exit signs in green colour shall be provided showing the means of escape at each floor of building. Portable lights / insta lights shall be provided at strategic location in the staircase and lift lobby.
30. The staircase and corridor lighting shall be on separate circuits and shall be independently connected so that they could be operated by one switch installation on the ground floor easily accessible to fire fighting staff at any time irrespective of the position of the individual control of the light points, if any.

31. Staircase and corridor lighting shall also be connected to alternate supply.
32. Double throw switches shall be installed to ensure that lighting in the staircase and the corridor do not get connected to two sources of supply simultaneously. A double throw switch shall be installed in the service room to terminate the stand-by-supply.
33. Emergency lights shall be provided in the staircase / corridors.
34. Electric cable shaft shall be exclusively used for electric cables and should not be open in staircase enclosure.
35. Electric shaft shall be sealed at each floor level with non-combustible material such as vermiculite concrete. No storage shall be permitted in electric cabin or shaft.
36. Inspection door for the shaft shall have two hours fire resistance.
37. Electric wiring / cable shall be of non-toxic, non-flammable, low smoke hazard having copper core fire resistance for the entire building with provision of ELCB/MCB.
38. Electric meter room shall be adequately ventilated, accessible & shall not be under staircase, basement, lift-lobby.
39. Electric wiring shall be having copper core having the fire resistance and low smoke hazard cables for the entire building with provision of ELCB/MCB
40. Low and medium voltage wiring running in shaft and in false ceiling should run in separate conduits.
41. Water mains, telephone lines, intercom lines, gas pipes or any other services should not be laid in the duct for electric cable; use of bus bar/solid rising mains instead of cables is preferred.
42. Separate circuits for fire fighting pumps, lifts, staircase and corridor lighting and blowers for pressurizing system shall be provided directly from the main switch gear panel and these circuits shall be laid in separate conduit pipes so that fuse in one circuit will not affect the others. Such circuits shall be protected at origin by an automatic circuit breaker with its no-volt coil removed.
43. Master switches controlling essential services shall be clearly labeled & provide in the lobby for emergency operation.
44. False ceiling if provided in the building shall be of non-combustible material. Similarly, the suspenders of the false ceiling shall be of non-combustible materials.
45. Materials For Interior Decoration / Furnishing :  
The use of materials which are combustible in nature and may spread toxic fumes/gases should not be used for interior decoration/furnishing, etc.
46. Fire drill / evacuation drill :  
Fire drill and evacuation drill shall be conducted regularly in accordance with fire safety plan of building at least once in a three month in consultation with Mumbai fire brigade and log of the same shall be maintained.
47. Signage's :  
Self-glowing/fluorescent exit signs in green color shall be provided showing the means of escape of the building.
48. Fire Escape Chute : **NOT APPLICABLE.**
49. **Refuge area** : Refuge area provided as per plan shall be conforming to the following requirements :
  - (a) Refuge area in Type. D is provided at 2nd Floor (14.50 Mt) with Fire Door as per CGDCR-2017.
  - (b) The layout of the refuge area shall not be changed at any time in future without prior permission of this department.
  - (c) Refuge area shall be provided with railing of 1.10 meters height on external sides and shall be of sound construction.
  - (d) Refuge area shall be segregated by brick masonry partition wall of 9" thickness or concrete block wall of 6" thickness and access to refuge area shall be gained

- through half an hour fire resistance self-closing door.
- (e) Refuge area shall be earmarked exclusively used for the use of occupants as temporary shelter and for the use of fire brigade department or any other organization dealing with fire or other emergencies when they occur in the building and also for exercises if conducted by the fire brigade department.
  - (f) There shall not be any opening in to the refuge area from any portion of the occupied premises.
  - (g) Refuge area shall not be allowed to be used for any other purpose and it shall be the responsibility of the owner to maintain the same clean and free of the encumbrances and encroachments, at all times.
  - (h) Adequate drinking water facilities shall be provided in the refuge area.
  - (i) Entrance door to the refuge area shall be painted or fixed with a sign painted in luminous paint mentioning "REFUGE AREA IN CASE OF EMERGENCY".
  - (j) Adequate emergency lighting facility connected to electric circuits of staircase lighting shall be provided in the refuge area.
50. Astro turf etc. shall not be permitted in the courtyard and in the drive way.
  51. A certificate to the effect that the fire resistance protection has been provided as above shall be furnished from the Structural Engineer/Architect at the time of applying for occupation of the building.
  52. All gaps between floor-slabs and to facade assembly shall be sealed at all levels by approved fire resistant Seal and material of 02 hrs fire rating.
  53. Sprinkler system for glass facade providing full coverage to the glass.
  54. Addressable Fire Alarm & Detection System as per NBC-2016 (Table-7).
  55. Openable panels shall be provided on each floor and shall be spaced not more than 10 mt apart measured along the external wall from centre to centre of the access opening.
  56. This NOC is issued from fire risk point of view only.
  57. Trained man power shall be available for the fire fighting and lift rescue in the building premises round the clock .
  58. Any deviation w.r.t. construction shall be verified by the concerned building sanctioning authority.
  59. The certificate may not be treated in any case for regularisation for unauthorised construction if any.
  60. Form 16 from FPCOR to be submitted at the time of Fire Inspection of building.
  61. The opinion is given on the basis of submitting drawings /documents only.
  62. Facade & Elevation Design & Drawing shall have to be approved by Registered Facade Consultant.
  63. Any other instructions given by the fire department from time to time about fire safety of the Building premises to be followed norms.
  64. Fire officer can check the arrangements of Fire safety at any time, this certificate will be withdrawn without any notice if any deficiency is found.
  65. Occupants /Owner should apply for renewal of fire safety certificate 01 Month prior expiry of this certificate.
  66. Trained officers / security guards :
    - The trained security / fire supervisor along with trained staff having basic knowledge of firefighting & fix firefighting installation shall be provided / posted in the building.
    - They will be responsible for the following;
    - (a) Maintenance of all the first aid firefighting equipment, fixed installations & other firefighting equipment / appliance in good working condition at all times.
    - (b) Imparting training to the occupants of the building in the use of firefighting equipment provided on the premises & keep them informed about fire & other

emergency evacuation procedures.

- (c) To liaise with the city fire brigade on regular & continual basis.
  - (d) The mock drill with the designated fire marshal for any operation of disaster management plan shall be out regularly after occupation as per National Building Code.
67. The fire department of SMC will not responsible for any loss of life and property due to Fire / Emergency incident.

  
I/C Dy Chief Fire Officer

FES/ OUTWARD/NOC 1501  
DT. 07-07-2021

  
I/C CHIEF FIRE OFFICER  
Surat Municipal Corporation

